



DuPont SHE Excellence Center

July 9, 2001

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Christine Whitman, Administrator  
U.S. Environmental Protection Agency  
P.O. box 1473  
Merrifield, VA 22116

Attention: Chemical Right-to-Know Program

Dear Administrator Whitman:

Re: EPA Comments on the Test Plan and Robust Data Summary for Dimethyl ether (CAS No. 115-10-6)

We received EPA's comments on DuPont's test plan and robust data summary for the chemical Dimethyl ether (CAS No. 115-10-6) and are pleased to respond. We have considered the recommended revisions to the ecotoxicity studies and the transport/distribution modeling and EPA's specific comments on the robust data summaries and we have revised our submittal as noted on the attached summary sheet. The revised robust data summary is also attached to this submittal.

If you have any questions about our response, please contact:

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Sincerely,

Edwin L. Mongan III

CC: Charlie Auer - EPA

Summary of Changes to DuPont's Test Plan and Robust Data Summary  
Dimethyl ether (CAS No. 115-10-6)  
7/9/01

Chemistry:

Moved Riddick reference to additional reference and summarized the data suggested by the EPA.

Fate:

Hydrolysis information was removed from the photodegradation section. It was not added to the stability in water section since that section had adequate data already there.

Volatization from moist and dry soil surfaces was removed from the stability in water section. It was not added to the fugacity section since that section had adequate data already there.

Recommended water solubility value was used in the stability in water section.

Additional data were provided for the fugacity model used.

Health Effects:

Repeated Dose/Reproductive Toxicity Study: Added incidence table, historical control data, and additional text.

Developmental Toxicity Study: Removed Part I from the summary as this was the rangefinder study conducted to set dose levels for Part II (the main study). Only the main study was summarized. The number of fetuses and sex ratios were added. Incidence tables were added for the skeletal variations.

Ecotoxicity Studies:

Fish and daphnid studies: Study sponsor was contacted and the additional information was requested. Information obtained from the original study sponsor was added to the robust summaries.

Aquatic plant study: Text was added to address analog data.